

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION**

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

PLAINTIFF

v.

NO: 2:22-CV-00131-KS-MTP

TRACTOR SUPPLY COMPANY

DEFENDANT

**DEFENDANT'S UPOPOSED MOTION FOR EXTENSION OF
DEADLINES TO COMPLETE DISCOVERY AND FILE DISPOSITIVE MOTIONS**

COMES NOW the Defendant, and moves the court unopposed for a brief extension of the deadlines to complete discovery and file dispositive motions. Defendant does not anticipate that the brief requested extensions will impact any other deadlines. In support of its motion, Defendant states the following:

1. The current deadline for completing discovery in this matter is February 29, 2024, and the deadline for filing dispositive motions is March 15, 2024. The trial in this case is set for the two-week term beginning August 5, 2024, and the parties are scheduled for a settlement conference on March 18, 2024 in Hattiesburg.
2. The parties had scheduled all remaining depositions to be completed before the current discovery deadline, but need to reschedule the deposition of Defendant's corporate representative witness to March 6, 2024 to permit counsel for Defendant additional time to ensure the witness is prepared as to the large number of topics presented in Plaintiff's notice. All other depositions will be completed before the current deadline. Therefore, Defendant respectfully requests that the Court extend the deadline for completing discovery to March 6, 2024.

3. Additionally, Defendant requests that the deadline for filing dispositive motions be extended by two weeks, up to and including March 29, 2024, to permit sufficient time for the transcript from the March 6th deposition to be produced, and to allow Defendant to wait to file its dispositive motion until after the March 18th settlement conference.

4. Plaintiff does not oppose the requested extensions.

5. Defendant does not anticipate that the requested extensions will impact the August 5th trial date or any other deadline in this matter, as the new deadline for filing dispositive motions will still be more than four months prior to the trial.

6. Finally, due to the straightforward nature of this motion, the parties request that they be excused from the requirement of filing a supporting memorandum.

This, the 16th day of February, 2024.

Respectfully submitted,

/s/ Kimberly Hodges
M. Kimberly Hodges (MS Bar No. 100276)
OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.
6410 Poplar Avenue, Suite 300
Memphis, TN 38119
Telephone: 901.767.6160
Facsimile: 901.767.7411
Email: kim.hodges@ogletreedeakins.com

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I, counsel for Defendant, hereby certify that a copy of the foregoing has been served via the Court's Electronic Case Filing System upon all counsel of record on this, the 16th day of February, 2024.

/s/ M. Kimberly Hodges
M. Kimberly Hodges

CERTIFICATE OF CONSULTATION

I, the undersigned counsel for Defendant, hereby certify that I conferred with counsel for Plaintiff with regarding to the extension sought herein and was advised that Plaintiff does not oppose the requested relief.

/s/ M. Kimberly Hodges
M. Kimberly Hodges